

PETER WESSEL, ESQ. (PW 4164)
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DING MING LIU, XIANG WEI CHEN, JIAN RONG	: Docket No. 08 CV 4199 (GBD)
KE, CHUAN JING LIN, MU QIU LIU, ZHONG MIN	:
SHI, SHENG DA WENG, GUO FENG ZHANG and	:
GUO LI ZHANG,	:
	:
Plaintiffs,	:
	: <u>NOTICE OF MOTION</u>
- against -	:
	:
JIN JIN COMMERCE CORP., XIN XIN COMMERCE	:
CORP., HAI BING WANG, JANE DOE I, a/k/a "Cindy,"	:
and JANE DOE II, a/k/a "Xiao Yen,"	:
	:
Defendants.	:
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PLEASE TAKE NOTICE, that upon the accompanying Declaration of PETER WESSEL, ESQ., dated August 18, 2008, the accompanying Affidavit of HAI BING WANG, sworn to on August 15, 2008, and the documents annexed thereto, and the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss, and all the prior pleadings and proceedings heretofore had herein, the Defendants, JIN JIN COMMERCE CORP., XIN XIN COMMERCE CORP., HAI BING WANG, JANE DOE, a/k/a "Cindy," (JIAN-XU SUN, also known as "Sandy") and JANE DOE II, a/k/a "Xiao Yen" (XIO YEN WANG), will move this Court, in Courtroom 15D of the United States Courthouse, 500 Pearl Street, New York, New

York, on the ____ day of _____, 2008 at ____ a.m./p.m. for an Order (1) dismissing the complaint insofar as asserted by Plaintiff DING MING LIU, and (2) dismissing those claims which are barred by the applicable Statutes of Limitations, together with such other and further relief as this Court may deem just and appropriate.

Dated: New York, New York
August 18, 2008



PETER WESSEL (PW 4164)

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